



# NATIONAL PARK SERVICE ENVIROFACTS

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## SORBENTS AND WIPES MANAGEMENT

### DEFINITIONS

**Solid Waste:** Solid, liquid, or contained gaseous material that is intended to be discarded by being disposed of, burned or incinerated, or recycled.

**Hazardous Waste (HW):** Solid waste that meets the definition of a characteristic or listed hazardous waste, and is not otherwise excluded from regulation.

### APPLICABLE STANDARDS

**Federal:** Resource Conservation and Recovery Act (RCRA) regulations 40 CFR 261 and 262.11.

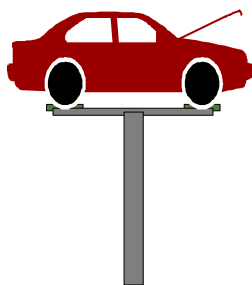
**State:** State RCRA regulations and regulations covering the management of non-hazardous solid waste.

**Other:** Additional federal and state standards may apply to the management of sorbents and wipes at your park.

### HANDLING & STORAGE

Waste material such as used rags, paper wipes, sorbent booms and floor sweeps are common waste streams generated by parks.

Typical items would include rags or wipes used to remove solvent during cleaning operations or a sorbent boom used to cleanup an oil spill. Generally, these items are



characterized for disposal in the same manner as any other solid waste generated at the park. However, they are commonly overlooked and improperly disposed of in the general trash without any consideration of their potential to be hazardous or special waste.

Because these materials are easily overlooked, it is important for parks to actively manage sorbent and wipe materials. Some typical management practices for these types of materials are as follows:

#### Rags:

Many parks use industrial laundry services for their rags. EPA and state regulatory agencies typically do not consider this practice to be regulated by RCRA since the rags are being reused. For safety reasons, parks should ensure that containers of solvent rags being used for accumulation and/or transport are compatible with the material being stored. For solvent rags it is a good practice to use containers designed for flammable material storage.



#### Solvent wipes or discarded rags:

These items are generated from the wiping or cleanup of solvent materials that, if discarded, meet the definition of a RCRA ignitable and/or listed waste. If the solvent is only considered a HW due to ignitability, then it is generally allowable for the waste wipes or rags to be managed as non-hazardous waste provided they are allowed to sufficiently air dry prior to disposal. Wipes or rags that contain residue from listed HW must be managed as a listed waste in accordance with the RCRA mixture rule: "Waste mixed with HW is a HW."

#### Sorbent booms:

Materials such as sorbent booms or shop-dry sorbents that contain only waste oil can generally be managed as a RCRA non-hazardous waste provided that all of the used oil has been completely (i.e. no visible signs of free flowing oil remain) drained or removal from the materials. Also, if the materials do not fail any of the characteristically hazardous tests. Usually it is necessary to have sorbent booms permitted for disposal as a special waste. They should not be placed into the general trash.

Sorbent booms used to cleanup flammable materials such as gasoline should be managed as an RCRA regulated hazardous waste.

### DISPOSAL

If a sorbent or wipe waste stream is determined to be hazardous, then appropriate management and disposal procedures must be implemented.

Waste material that is not determined to be hazardous must be further characterized in accordance with local solid waste management rules. In most states, materials such as

sorbents and wipes are classified as "special waste." Generally a permit for their disposal must be obtained from the state regulatory agency or through a permitted disposal facility.

### SPECIAL TOPICS

#### Characterization

The first step is to determine whether or not the spent sorbents/wipes meets the definition of a RCRA solid waste. If so, then the following steps should be followed to determine whether or not it is a hazardous waste:

1. Determine if the waste is excluded from HW regulation by reviewing 40 CFR 261.4.
2. If not excluded, then determine whether the waste is a listed hazardous waste (40 CFR 261, Subpart D). This includes wastes from specific and non-specific sources, as well as discarded product/off-specification chemicals/drum residue/spill residue. Please note that, mixtures of listed HW waste and solid waste are classified as listed HW.
3. If not a listed hazardous waste, determine if the waste is hazardous (40 CFR 261, Subpart C) by exhibiting one or more of more of the following characteristics:
  - Ignitability – Flashpoint <140°F
  - Corrosivity - pH <2 or >12
  - Reactivity - unstable under standard temperature and pressure (STP)
  - Toxicity Characteristic (TC) – toxic chemical concentration exceeding regulatory levels

### POLLUTION PREVENTION

Sorbent and wipe materials are typically used in quantities that exceed the actual need. Parks should educate employees to only use the amount of sorbent or wipe material necessary to address each situation.

### ENVIROFACTS X-REFERENCES

- Environmental Training
- Hazard Communication
- Spill Prevention Planning
- Used Oil Management
- Spent Solvent Management
- Hazardous Waste Characterization

## SORBENTS & WIPES MANAGEMENT CHECKLIST

Checklist Item	Notes
1. Review your sorbents & wipes waste streams and ensure that the materials are being properly disposed, recycled, or reused when feasible.	
2. Inspect solid waste receptacles to ensure that regulated sorbents and wipes waste are not being improperly disposed of.	
3. Determine if sorbents and wipes waste that is currently being disposed could be reused or recycled.	
4. Determine if Land Disposal Restriction notifications are required for each of your sorbent and wipe waste streams. For example, sorbent materials containing methylene chloride would require this notification.	
5. If the park is managing certain solvent wipes and rags waste as non hazardous, assure that the current waste materials have been properly air dried before placing in waste receptacles.	
6. Ensure that sorbent oil boom waste is being managed in accordance with your states "special waste" management requirements.	
7. Ensure that approved flammables containers are used for the collection of waste wipes and rags.	